

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: R30-04100010-2011
Application Received: December 20, 2010
Plant Identification Number: 041-00010
Permittee: Dominion Transmission, Inc.
Facility Name: Camden Station
Mailing Address: 445 West Main Street
Clarksburg, WV 26301

Physical Location: Camden, Lewis County, West Virginia
UTM Coordinates: 534.85 km Easting • 4323.27 km Northing • Zone 17
Directions: Interstate 79 North to the Weston Exit. Turn left on Route 33 West through Weston. Turn left onto Smith Run Road and go 1.5 miles. Turn left onto gravel road and proceed 0.3 miles to station on the left.

Facility Description

Camden Compressor Station (CS) is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922 and North American Industry Classification System (NAICS) Code 48621. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of five (5) 600 HP natural gas fired reciprocating engines, one (1) emergency generator, one (1) dehydrator reboiler, one (1) dehydration unit, one (1) air compressor, and seven (7) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2009 Actual Emissions
Carbon Monoxide (CO)	127.49	83.18

Nitrogen Oxides (NO _x)	647.74	558.72
Particulate Matter (PM ₁₀)	1.31	Not reported
Total Particulate Matter (TSP)	1.31	0.92
Sulfur Dioxide (SO ₂)	0.10	0.06
Volatile Organic Compounds (VOC)	222.40	195.96

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions**	2009 Actual Emissions
Total*	11.2	17.1

Some of the above HAPs may be counted as PM or VOCs.

*No single HAP is more than 10 tpy. Largest single HAP emission is Formaldehyde with potential emission of 4.55 tpy.

**Potential emissions is the emissions after enforceable flare. A new dehy with enforceable flare was installed in July 2009. 2009 actual emissions did not take into account enforceable flare. This explains why 2009 actual HAP emissions is more than Potential HAP emissions.

Title V Program Applicability Basis

This facility has the potential to emit 647.74 tpy of NO_x, 127.49 tpy of CO, and 222.40 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc. Camden Compressor Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Control of PM from Combustion of Fuel in Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur requirements for fuel burned
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction permit requirement.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	40 C.F.R. Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
Federal Only:	40 C.F.R. 63 Subpart HH	NESHAP: Oil & Natural Gas Production Facilities.

	40 C.F.R. Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE)
State Only:	45CSR4 45CSR17 45CSR42	No objectionable odors. Fugitive Particulate Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2792	March 4, 2009	N/A
G60-C014	December 4, 2009	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B" which may be downloaded from DAQ's website.

Determinations and Justifications

Since the last significant modification of this permit on April 13, 2010, the following changes are made to the permit:

1. Emission Units Table in Section 1.1 of the permit – type of the engines have been added – e.g. Reciprocating Engine/Integral Compressor; Cooper GMXE-8 is a 2SLB (2 stroke lean burn) SI (Spark ignition) engine. These engines are subject to 40 C.F.R. 63 Subpart ZZZZ (see sections 5, 6 & 7 below); the type of engine determines which sections of 40 C.F.R. 63 Subpart ZZZZ are applicable to these engines.
2. Section 2.1.4 has been added to define “rolling yearly total”.
3. The citation in section 3.1.3 has been changed from 40 C.F.R. 61 to 40 C.F.R. §61.145(b).
4. Sections 3.1.9 and 3.5.10 have been added due to new rule 45CSR42 for greenhouse gas emissions.
5. This facility is not a major source of HAPs. According to 40 C.F.R. § 63.6585, this facility is subject to 40 C.F.R 63 Subpart ZZZZ because the facility operates a stationary RICE (A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work) at an area source of HAP emissions (an area source of HAP emissions is a source that is not a major source). According to the definition above, all the engines at this facility are RICE and are subject to 40 C.F.R 63 Subpart ZZZZ.
6. Emergency generator EG01 was installed in 2009. According to 40 C.F.R. § 63.6590(a)(2)(iii), “*New stationary RICE*” is defined as “A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006”. As defined above

- EG01 is new stationary RICE. EG01 has 475 HP design capacity. Because EG01 is new stationary RICE and less than 500 HP, EG01 is subject to section 6.1.3 of the permit. According to section 6.1.3, since EG01 must only meet the requirements of 40 C.F.R. Part 60 Subpart JJJJ, no additional requirements from 40 C.F.R. Part 63 Subpart ZZZZ were included in the permit for EG01.
7. Engines EN01-05 are existing stationary RICE. According to 40 C.F.R. § 63.6590(a)(1)(iii), “Existing stationary RICE” is defined as “For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006”. EN01 – 05 were installed from 1962 to 1964. EN01-05 are stationary non-emergency SI 2SLB engines > 500 HP located at an area source of HAPs; EN01-05 are subject to following sections of 40 C.F.R. Part 63 Subpart ZZZZ – 40 C.F.R. §§ 63.6603 (Table 2d – Section 6), 63.6595, 63.6605, 63.6640, 63.6665, 63.6625, 63.6655, 63.6645.
 Air Compressor CPR01 is an existing stationary RICE. According to 40 C.F.R. § 63.6590(a)(1)(iii), “Existing stationary RICE” is defined as “For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006”. CPR01 was installed in 1972. CPR01 is a stationary non-emergency SI 4SRB engines < 500 HP located at an area source of HAPs; CPR01 is subject to following sections of 40 C.F.R. Part 63 Subpart ZZZZ – 40 C.F.R. §§ 63.6603 (Table 2d – Section 9), 63.6595, 63.6605, 63.6640, 63.6665, 63.6625, 63.6655, 63.6645.
 8. There are no Greenhouse Gas Clean Air Act requirements for this facility because this is a renewal Title V permit and there have been no modifications that would have triggered a PSD permit.
 9. The requirement to perform initial and subsequent sampling was developed for non-controlled dehyds to ensure they do not exceed the MACT threshold of emissions. This condition was inserted into the permit prior to the new dehy installation which is equipped with a controlled flare. Since the dehy at the facility is now controlled with a federally enforceable flare that already meets the MACT standards and emissions with the control efficiency will be below the MACT threshold, there is no need to require a sampling schedule. This requirement was not from the construction permit for the new unit. Section 5.3.1 has been changed such that the permittee will determine the composition of wet natural gas at Director’s request.
 10. This is the second permit renewal for this facility. The facility was found not to be subject to CAM at the time of the first renewal. A significant modification was approved for the permit on June 9, 2009. A new DEHY was added during June 9, 2009 modification. The new DEHY is subject to 40CFR64 [CAM (Compliance Assurance Monitoring)]. CAM was addressed in June 9, 2009 revision.
 11. Paragraph d was added to Section 3.3.1 regarding submission of testing report.
 12. “Federally-enforceable only” citation has been taken out from sections 5.1.12, 5.1.13 and 5.3.3 of the permit. Although non-major area source MACT 40 C.F.R. Part 63 Subpart HH is excluded from state delegation in 45CSR34, its requirements are considered enforceable under 45CSR30 because of the definition in section 2.6.d, which includes any requirement subject to §112 of the CAA. This, coupled with section 5.2.a of 45CSR30, allows enforcement (by DAQ) of these non-delegated requirements.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

The following tanks are taken out from the permit because they are small tanks and do not have any regulatory requirements.

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
TK01	TK01	Vertical, above ground tank containing Triethylene Glycol	1991	2730 gallon	N/A
TK02	TK02	Vertical, above ground tank containing used oil	1991	2730 gallon	N/A
TK03	TK03	Vertical, above ground tank containing ethylene glycol	1991	4200 gallon	N/A

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
TK04	TK04	Vertical, above ground tank containing ethylene glycol	1962	2100 gallon	N/A
TK05	TK05	Horizontal above ground tank containing produced fluids	2003	2000 gallon	N/A
TK06	TK06	Vertical above ground tank containing wastewater	1962	2730 gallon	N/A
TK07	TK07	Vertical, above ground tank containing lube oil	2003	7000 gallon	N/A

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: March 9, 2011
Ending Date: April 8, 2011

All written comments should be addressed to the following individual and office:

U.K.Bachhawat
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

U.K.Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext.1256 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Dominion Transmission, Inc.'s (DTI) made the following comments by letter on March 21, 2011:

Comment No. 1: **Condition 3.7.2.b should be amended to read:**

45CSR34 – Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40 C.F.R. Part 63. This rule normally applies to sources that are subject to 40 C.F.R. Part 63. However, there are certain federal regulations that are not adopted by this state rule (45CSR34). In particular, 45CSR§34-4.1.c. states that “Provisions under Subpart HH of 40 CFR Part 63 which apply to non-major area sources of hazardous air pollutants described in 40 CFR §63.760(b)(2) shall be excluded,” and 45CSR§34-4.1.d, states that “Provisions under Subpart ZZZZ of 40 CFR Part 63 which apply to non-major area sources of hazardous air pollutants described in 40 CFR §63.6585(c) and (d) shall be excluded.” Per condition 3.1.11, the facility has been determined to be a non-major area source of HAPs, subject to Subparts HH and ZZZZ. Since the facility and sources meet the exclusion criteria at 45CSR§34-4.1.c and 4.1.d, the TEG dehydration unit and affected reciprocating internal combustion engines are not subject to 45CSR34. This explains why the Subpart HH and Subpart ZZZZ requirements are written as “federally-enforceable only.” Note that this non-applicability determination is based upon Subpart HH and Subpart ZZZZ only, and does not prevent the facility from becoming subject to 45CSR34 in the future should the facility or equipment become subject to a standard that is not specifically excepted in 45CSR§34-4.1.a. through 4.1.f.

The department had previously created the above condition in a June 9, 2009, significant modification to address the fact that the new dehydration unit was subject to the non-major area source standards for 40CFR Part63 Subpart HH, for which west Virginia Department of Environmental Protection (“Department”) did not accept delegation as codified under 45 CSR 34-4.1.c. In creating this condition, the Department acknowledged that the unit was subject to applicable federal requirements which must be incorporated into the Title V, however the department did not have delegated authority of the standard per 45CSR34. The condition and methodology was acceptable to USEPA as they did not object during the comment period of the draft permit. Therefore, Dominion believes it is appropriate and justified to expand upon Condition 3.7.2.b to include the non-major area source standard for 40 CFR 63 Subpart ZZZZ, for which several units at the facility are subject (as noted in Section 7 of the draft permit).

Comment No. 2. **Condition 5.5.3 should be amended to read:**

If the permittee is required by the Director to demonstrate compliance with section 5.3.2...”

The condition previously referenced condition 5.2.1, which is for sampling and analyzing the wet gas composition in order to model emissions of the dehydration unit. Condition 5.3.1 includes language requiring a protocol for the sampling of 5.2.1 only if alternative methods were proposed that were not consistent with the language of 5.2.1. Therefore condition 5.5.3 as written in the draft would conflict with condition 5.3.1. DTI believes condition 5.3.1 as written is appropriate and that condition 5.5.3 should reference condition 5.3.2, which is Director’s ability to request a flare compliance assessment.

Comment No. 3: **Section 7.0 of the draft permit should be amended to add a clarification that the section is “federally enforceable only.”**

Expanding upon the justification explained for condition 3.7.2.b, during the June 9, 2009 significant modification the conditions incorporated into the permit which were applicable federal requirements for non-major area sources under 40 CFR Part 63 Subpart HH were specifically identified in the permit as “federally enforceable only” (see conditions 5.1.12, 5.1.13, 5.3.3 and 5.4.11). This methodology was acceptable to USEPA, as they did not object during the comment period of the draft permit. As such, Dominion believes it is appropriate and justified to continue this approach for area source standards of

Subpart ZZZZ and denote that the conditions of Section 7 are applicable federal requirements for which the department has not accepted delegation per 45CSR34.

Response to Comment No. 1:

Condition 3.7.2.b will be amended as follows:

45CSR34 – Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40 C.F.R. Part 63. This rule normally applies to sources that are subject to 40 C.F.R. Part 63. However, there are certain federal regulations that are not adopted by this state rule (45CSR34). In particular, 45CSR§34-4.1.c. states that “Provisions under Subpart HH of 40 CFR Part 63 which apply to non-major area sources of hazardous air pollutants described in 40 CFR §63.760(b)(2) shall be excluded,” and 45CSR§34-4.1.d. states that “Provisions under Subpart ZZZZ of 40 CFR Part 63 which apply to non-major area sources of hazardous air pollutants described in 40 CFR §63.6585(c) and (d) shall be excluded.” Per condition 3.1.11, the facility has been limited to be a non-major area source of HAPs, subject to Subparts HH and ZZZZ. ~~It was determined that the facility is a non major source of HAPs (i.e., area source). Further, the TEG dehydration unit is the only equipment subject to Subpart HH requirements, and is the source identified in 40 C.F.R. §63.760(b)(2). Since the facility and sources meet the exclusion criteria at 45CSR§34-4.1.c and 4.1.d, the TEG dehydration unit and affected reciprocating internal combustion engines are not subject to 45CSR34. Since the facility and source meet the exclusion criteria at 45CSR§34 4.1.c., the TEG dehydration unit is not subject to 45CSR34.~~ Note that this non-applicability determination is based upon Subpart HH and Subpart ZZZZ only, and does not prevent the facility from becoming subject to 45CSR34 in the future should the facility or equipment become subject to a standard that is not specifically excepted in 45CSR§§34-4.1.a. through 4.1.f~~e~~.

Please note that condition 3.1.11 limits the facility to be a non-major source of HAPs, so where DTI requested the word “determined” in the above passage, a more appropriate term is “limited”.

Response to Comment No. 2:

Condition 5.5.3 will be amended to read: If the permittee is required by the Director to demonstrate compliance with section 5.3.2...”

Response to Comment No. 3 and inclusion of “federally enforceable only” in Comment No. 1:

DTI’s request to add “federally enforceable only.” in condition 3.7.2.b and Section 7.0 is denied because: Utilizing the applicable requirement definition from 45CSR30, and more specifically, section 2.6.d is the basis for having such requirements in the Title V permit. Section 2.6.d specifies any standard or other requirement under §112 of the CAA. This, however, is not disputed. 45CSR30 does not specify the use of the notation of “Federally-enforceable only” requirements and states that any requirement within the Title V permit is enforceable by the Secretary, U.S. EPA and citizens under the CAA, with the exception of conditions (such as 45CSR27) which are specifically designated as “State-Enforceable only.” This may be found in section 5.2.a of the rule. Given that all conditions are enforceable by the Secretary, enforcement of non-delegated area source requirements is not precluded and may be/will be enforced under the authority of the Secretary.

Please note that based on the explanation above, “Federally-enforceable only” citations in the June 9, 2009 significant modification for conditions 5.1.12, 5.1.13 and 5.3.3 were left out of the draft permit. Also based on the explanation above, “Federally enforceable only” citation will be removed from condition 5.4.11 in the draft permit, as this was mistakenly left in the draft permit.